

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR,

Defendants.

**DEFENDANTS' MOTION FOR LEAVE  
TO TAKE MORE THAN TEN DEPOSITIONS**

Defendants move, pursuant to Fed. R. Civ. P. 30(a)(2)(A) and Local Rule 26.1(C), for leave to take more than ten depositions.

Defendants have taken eight depositions to date. As set forth in the accompanying memorandum in support of this motion, defendants need to take approximately nine additional depositions, for a total of seventeen, in order to establish their defenses to the patent infringement and trade secret claims asserted against them by plaintiff ScanSoft, Inc. The patent infringement and trade secret claims are completely unrelated. They raise distinct and complex issues. The proposed depositions are necessary to establish the myriad facts critical to defendants' case.

WHEREFORE, defendants request leave to take seventeen depositions.

Respectfully submitted,

LAURENCE S. GILICK, ROBERT S. ROTH,  
JONATHAN P. YAMRON, MANFRED G.  
GRABHERR and VOICE SIGNAL  
TECHNOLOGIES, INC.

By their attorneys,

/s/ Paul E. Bonanno

Robert S. Frank, Jr. (BBO No. 177240)  
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CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for defendants conferred with counsel for ScanSoft on June 9, 2005 in an effort to resolve the issues presented in this motion and that the parties were unable to reach an agreement.

/s/ Paul E. Bonanno

Dated: June 9, 2005  
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